



Partners  
Dawn M. Cardi  
Chad L. Edgar

Associates  
Jessica Friedrich  
Joanna C. Kahan

Of counsel  
Diane Ferrone

December 11, 2020

**Via ECF**

Hon. J. Paul Oetken  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: United States v. Ahmad Akbar, 20-cr-563 (JPO)

Your Honor:

I am CJA counsel to Ahmad Akbar. The parties jointly propose the following consent bail package for Mr. Akbar's release:

- \$100,000 personal recognizance bond co-signed by 2 financially responsible persons
- Travel restricted to SDNY/EDNY and MDPA as necessary for self-surrender and/or court appearances
- Surrender travel documents and no new applications
- Within 45 days of release, self-surrender to the Pennsylvania State Police to address outstanding warrant
- Pretrial supervision as directed by Pretrial Services ("PTS")
- Drug testing/treatment as directed by PTS
- Curfew with electronic monitoring, with the curfew hours and electronic monitoring equipment to be determined by PTS
- Defendant not to possess a firearm, weapon, or other destructive device
- Defendant to maintain or to seek employment
- Defendant not to possess identification information of other individuals
- Defendant not to open bank accounts or apply for credit cards/other lines of credit without the approval of PTS
- Defendant is not to have contact with co-defendants except in the presence of counsel
- Defendant to be released on his own signature with two weeks from the date of release to meet the bond's conditions

If the Court approves the proposed bail package, the defendant moves to withdraw the motion for bail filed yesterday. See ECF # 97.



Partners  
Dawn M. Cardi  
Chad L. Edgar

Associates  
Jessica Friedrich  
Joanna C. Kahan

Of counsel  
Diane Ferrone

The parties are available if the Court has any additional inquiries. Thank you.

Very truly yours,

/s/

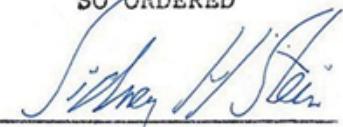
Dawn M. Cardi

CC: All Parties (via ECF)

**Bail package approved [Doc. No. 98].**

**Dated: New York, New York**  
**December 11, 2020**

**PART I**

SO ORDERED  
  
SIDNEY H. STEIN  
U.S.D.J.